

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>HARRY WILLIAMSON</b>	)	<b>CASE NO. 1:23-cv-01507</b>
	)	
<b>Plaintiff,</b>	)	
	)	<b>JUDGE: DAVID A. RUIZ</b>
<b>vs.</b>	)	
	)	
<b>LORAIN COUNTY, ET AL.,</b>	)	<b>NOTICE OF WAIVER OF POSSIBLE</b>
	)	<b>CONFLICTS OF INTEREST</b>
<b>Defendants.</b>	)	
	)	

Defendant Thomas Williams, by and through counsel places this Court on notice that it is waving any potential conflicts of interest of its attorney, William J Novak as set forth in the attached affidavit..

Respectfully submitted,

/s/ William J. Novak  
WILLIAM J. NOVAK (0014029)  
**NOVAK, LLP**  
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*Attorney for Defendant, Tom Williams*

**CERTIFICATE OF SERVICE**

A true copy of the foregoing was served on this 26th day of August, 2025, through the Court's electronic filing system.

/s/ William J. Novak  
WILLIAM J. NOVAK (0014029)

*Attorney for Defendant, Tom Williams*

STATE OF Pennsylvania,  
Erie COUNTY ) SS: AFFIDAVIT

I, Thomas Williams, being first duly sworn according to law, depose and state as follows:

1. I am a named Defendant in the case of *Williamson v. Lorain County, et al.*, 1:23-cv-01507;
2. On August 12, 2025, a telephone status conference was held regarding the aforementioned case, but it was not recorded;
3. During the telephone conference, I became apprised of Plaintiff's concerns regarding potential conflicts of interest involving my attorney, William J. Novak, specifically potential conflicts raised in the Hung affidavit, attached as Exhibit 1, to Plaintiff's Brief in Opposition to Defendants' Motion for Summary Judgment;
4. During the telephone conference, I also became aware of a side, switching issue raised by Plaintiff's counsel against Mr. Novak;
5. I disagree that there are any conflicts of interest, more importantly, if there is any suggestion that Mr. Novak has engaged in any conflicts of interest, I waive those conflicts.

FURTHER AFFIANT SAYETH NAUGHT.

Thomas Williams Jr  
THOMAS WILLIAMS JR

SWORN TO AND SUBSCRIBED before me at Erie PA, this 24 day of August, 2025

Christopher Fanzini  
Notary Public

